

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

RUBEN J. ESCANO,	§	
	§	
Plaintiff,	§	
	§	2:22-CV-00360-DHU-GJF
vs.	§	
	§	
RCI, LLC, <i>et al.</i>	§	
	§	
Defendants.	§	

DEFENDANT RCI, LLC’S PROPOSED EXHIBIT LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court’s Trial Notice of April 10, 2024, Defendant RCI, LLC (“RCI”), by and through its attorneys, discloses the following as documents that RCI intends to introduce into evidence at trial and witnesses that RCI intends to call to testify:

1. Complaint dated April 4, 2022, in *Ruben Escano v. RCI, LLC; Timescape Resorts, LLC; Stephen Bradley; Mexican Riviera Resorts Unlimited S.A. de C.V., Co.*, Case No. D-608-CV-2022-00059, in the District Court of Grant County, New Mexico
2. First Amended Complaint dated April 6, 2023, in *Ruben Escano v. RCI, LLC; Timescape Resorts, LLC; Stephen Bradley; Mexican Riviera Resorts Unlimited S.A. de C.V., Co.*, Case No. 2:22-cv-00360-DHU-GJF, in the United States District Court for the District of New Mexico
3. Proposed Second Amended Complaint in *Ruben Escano v. RCI, LLC; Timescape Resorts, LLC; Stephen Bradley; Mexican Riviera Resorts Unlimited S.A. de C.V., Co.*, Case No. 2:22-cv-00360-DHU-GJF, in the United States District Court for the District of New Mexico

4. Complaint in *Ruben J. Escano v. Holidays Network Group, LLC, and Jorge Bravo*, Case No. 22-cv-0058-SMV-GJF, in the United States District Court for the District of New Mexico
5. Order dismissing with prejudice *Ruben J. Escano v. Holidays Network Group, LLC, and Jorge Bravo*, Case No. 22-cv-0058-SMV-GJF, in the United States District Court for the District of New Mexico
6. Dialer Training.ppt
7. Escano Notes, ESCANO-00040 through ESCANO-00045
8. RCI Affiliation Agreement, English-Translation
9. RCI Amendment to Affiliation Agreement, English-Translation

Defendant will call or have available at trial the following witnesses:

1. Jennifer Dongus. Ms. Dongus will testify regarding RCI's policies and procedures relating to outbound calls; the location and staffing of RCI's outbound call center; RCI's record-keeping with regard to outbound calls; and RCI's investigation into Mr. Escano's claims.
2. Cristian Alatorre. Mr. Alatorre will testify regarding the relationship between RCI and resorts affiliated with Sunset World; the manner in which resorts enroll timeshare owners in RCI's network; and the lack of a relationship between RCI and MXRRU.

Dated: October 21, 2024

Respectfully submitted,

/s/ Joseph C. Wylie II

Joseph C. Wylie II (*pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2024, I caused a true and correct copy of the foregoing Defendant RCI, LLC's Proposed Exhibit List to be served upon counsel of record by e-mail.

/s/ Joseph C. Wylie II